

U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
FILED

2020 SEP -9 P 1:20

UNITED STATES OF AMERICA

CLERK OF COURT

Plaintiff,

v.

DANIEL E. ZUNKER,

Defendant.

20-CR-163

Case No. 20-CR

[18 U.S.C. §§ 922(a)(6), 922(g)(3) &
924(a)(2)]

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about September 25, 2017, in the State and Eastern District of Wisconsin,

DANIEL E. ZUNKER,

in connection with the acquisition of a firearm from Freedom Arms Unlimited, LLC, a federally licensed firearms dealer, in Oconomowoc, Wisconsin, knowingly made a false and fictitious written statement intended and likely to deceive Freedom Arms Unlimited, LLC as to a fact material to the lawfulness of the sale and disposition of such firearm under the provisions of Chapter 44 of Title 18, United States Code.

2. In particular, in connection with the purchase of the firearm described below, Daniel E. Zunker falsely stated on the Firearms Transaction Record (ATF Form 4473) that he was not an unlawful user of, or addicted to, a controlled substance when, in fact, Zunker admitted that he was a daily user of Suboxone, a Schedule III controlled substance.

3. The firearm is further described as a Glock, model 23GEN4, .40 caliber pistol, bearing serial number BBTK146.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about September 30, 2017, in the State and Eastern District of Wisconsin,

DANIEL E. ZUNKER,

being an unlawful user of controlled substances, to wit, Suboxone, a Schedule III controlled substance, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is further described as a Glock, model 23GEN4, .40 caliber pistol, bearing serial number BBTK146.

All in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 14, 2017, in the State and Eastern District of Wisconsin,

DANIEL E. ZUNKER,

being an unlawful user of controlled substances, to wit, Suboxone, a Schedule III controlled substance, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is further described as a Vector, model Uzi, 9mm pistol, bearing serial number G930.

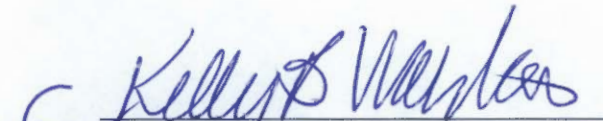
All in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

A TRUE BILL:



FOREPERSON

Date: 9/9/20


MATTHEW D. KRUEGER
United States Attorney